

EXHIBIT B

From: [Adam Slater](#)
To: [Christopher Geddis](#); [George T. Williamson](#); [Layne Hilton](#)
Subject: Fw: ZHP deposition calendar
Date: Sunday, January 24, 2021 7:26:45 AM

From: Joel Schneider <Judge_Joel_Schneider@njdcourts.gov>

Sent: Friday, January 15, 2021 1:15 PM

To: Goldberg, Seth A. <SAGoldberg@duanemorris.com>

Cc: Adam Slater <ASlater@mazieslater.com>

Subject: Re: ZHP deposition calendar

Thank you for the email. It looks like ZHP will be unable to resolve the issue today with plaintiffs or even to get together to resolve the issue today. I regret that I am off duty after today and can't help you. If there is something I can do today please let me know. Otherwise I feel your pain but all I can do is wish you the best of luck.

Sent from my iPad

On Jan 15, 2021, at 1:06 PM, Goldberg, Seth A.
<SAGoldberg@duanemorris.com> wrote:

CAUTION - EXTERNAL:

Thank You, Your Honor. As you know, the schedule of days of testimony is critically important to ZHP because arrangements for travel, including obtaining travel permits, have to be made, which is why we tried to get out in front of this in early December. We would like to work with Plaintiffs to reach agreement under the parameters of the Court's rulings on Wednesday.

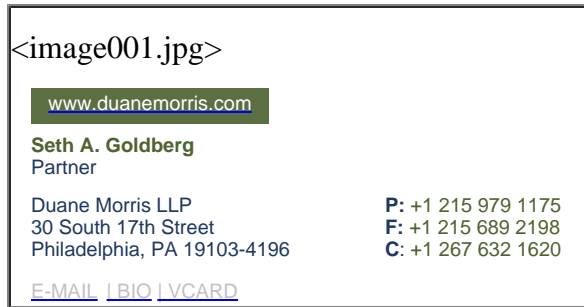
Mr. Slater emailed me at about 11:30 today with some suggestions for the schedule for us to consider and discuss. Unfortunately, I am unavailable today, and have not been able to review Mr. Slater's email closely, and I will not be able to discuss with my client any changes Mr. Slater has proposed because it is after the close of business on Friday in China (Shanghai is 11 hours ahead).

I would be happy to try to find time to meet with Mr. Slater this weekend, so that I can hopefully talk with my client Sunday night eastern time, Monday morning Shanghai time, or to find time with Mr. Slater Monday, so that I can talk with my client Monday night eastern time, Tuesday morning Shanghai time.

I will be following up with Mr. Slater shortly to find a time for us to talk.

Respectfully,

Seth Goldberg



From: Joel Schneider <Judge_Joel_Schneider@njdcourts.gov>
Sent: Friday, January 15, 2021 11:52 AM
To: Adam Slater <ASlater@mazieslater.com>
Cc: Goldberg, Seth A. <SAGoldberg@duanemorris.com>
Subject: Re: ZHP deposition calendar

I feel your pain. Let me know how I can help. I'm available to talk anytime today, including right now. Why don't you agree on what needs to be done and give me a call. My cell is 609-519-0632. I can enter order(s) today.
Sent from my iPad

On Jan 15, 2021, at 11:41 AM, Adam Slater
<ASlater@mazieslater.com> wrote:

CAUTION - EXTERNAL:

Hello Judge Schneider:

During the conference on Wednesday we left open the confirmation of the calendar with ZHP so that the parties could reconcile. I have emailed Seth with our suggestions - but there is a significant problem remaining with numerous depositions multi-tracked on the same days - likely including dates with three or potentially four ongoing depositions when the 75% is factored in and the time zone issue is factored in. We have made some suggestions to try to avoid this since it is obviously a large burden for both sides, and is explicitly not permitted under the deposition protocol unless ordered by the court.

We have been working to deal with this issue and I think both sides are in a tough position because of the loss of February and the deadline at the end of March, and I certainly take to heart and agree that it is preferable for the parties to resolve these issues, which we are trying to accomplish.

I am of course cognizant that today is your last day (I believe) and I would not blame you for punting this forward and leaving it to the parties to try to resolve or take up with the special master if necessary, I just wanted to avoid an order being entered without bringing this ongoing issue to your attention.

Thank you very much.

Respectfully,

Adam Slater

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